

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (DAYTON)**

STATE OF OHIO *ex rel.* DAVE YOST,
Attorney General of the State of Ohio,

Plaintiff,

v.

UNITED WHOLESALE MORTGAGE, LLC,

Defendant.

Case No.: 3:25-cv-00160

Hon. Thomas M. Rose

Hon. Judge Caroline H. Gentry

ORAL ARGUMENT REQUESTED

PLAINTIFF STATE OF OHIO'S MOTION TO REMAND

Plaintiff, the State of Ohio, through the Ohio Attorney General Dave Yost, respectfully submits this Motion pursuant to 28 U.S.C. § 1447(c) to remand this case to the Court of Common Pleas of Montgomery County, Ohio. Defendant United Wholesale Mortgage, LLC improvidently removed this action to this Court because there is no basis for federal subject-matter jurisdiction.

The grounds for this Motion are set forth in the accompanying Memorandum of Law.

Dated: July 7, 2025

Respectfully submitted,

s/ Melissa Wright by s/ Eric Palmer per email authorization

OFFICE OF THE ATTORNEY GENERAL OF OHIO

Melissa Wright (Ohio Bar No. 77843)
Section Chief, Consumer Protection Section
30 East Broad Street
Columbus, OH 43215
Tel.: (614) 466-8169
Melissa.Wright@OhioAGO.gov

BOIES SCHILLER FLEXNER LLP

Jesse Panuccio
Eric Palmer (Ohio Bar No. 99742)
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Tel.: (954) 356-0011
jpanuccio@bsfllp.com
epalmer@bsfllp.com

John T. Zach
Marc Ayala
55 Hudson Yards
New York, New York 10001
Tel.: (212) 446-2300
jzach@bsfllp.com
mayala@bsfllp.com

Tyler Ulrich
100 SE Second Street, Suite 2800
Miami, Florida 33131
Tel.: (305) 357-8422
tulrich@bsfllp.com

Counsel for Plaintiff State of Ohio

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, a copy of the foregoing was served on the following
via CM/ECF:

JONES DAY

Jeffrey J. Jones

Michael R. Gladman

Brandy Hutton Ranjan

325 John H. McConnell Boulevard, Suite 600

Columbus, Ohio 43215

Phone: (614) 469-3939

jjjones@jonesday.com

mrgladman@jonesday.com

branjan@jonesday.com

Counsel for Defendant United Wholesale Mortgage, LLC

s/ Eric Palmer

Eric Palmer